

## **NARRATIVE**

TO: Heather Brown

FROM: Cassie Smith

DATE: November 17, 2022

Facility Name: **Concorde Battery Georgia Corporation /Interspace Battery Georgia Corporation**  
AIRS No.: 067-00257  
Location: Austell, GA (Cobb County)  
Application #: 28609  
Date of Application: October 28, 2022

### **Background Information**

Concorde Battery Georgia Corporation/Interspace Battery Georgia Corporation (“Concorde”) is a lead acid battery manufacturing facility located in Austell. The facility is considered a synthetic minor source for nitrogen oxides (NO<sub>x</sub>), volatile organic compounds (VOC), and hazardous air pollutants (HAP) and currently operates under Air Quality Permit No. 3691-067-0257-S-01-0, issued April 9, 2014, and Amendment Nos. 3691-067-0257-S-01-1 and 3691-067-0257-S-01-2, issued September 4, 2015 and June 22, 2016, respectively.

### **Purpose of Application**

Concorde submitted Application No. 28609 for the purpose of installing an additional baghouse (BH03) at the facility. As part of this modification, Concorde also requests minor corrections as well as updates to the listed equipment and controls tables to more accurately reflect facility operations. Additionally, Concorde is requesting to clarify the reporting schedule for test reports. Facility emissions are not expected to change as a result of this modification.

### **Updated Equipment List**

Updated Attachment A – List of Facility Equipment

<b>Source Code</b>	<b>Description</b>
BU11-BU28	Natural Gas Fired Lead Melting Furnaces each with a heat input capacity 4.5 x 10 <sup>6</sup> Btu/hr: 18 units total
GC11-GC28	Natural Gas Fired Grid Casting Machines each with a heat input capacity of 0.45 x 10 <sup>6</sup> Btu/hr:18 units total
MP01-MP02	Natural Gas Fired Melt Pot Burners each with a heat input capacity of 0.214 x 10 <sup>6</sup> Btu/hr: two (2) units total
MP03-MP10	Electrically heated melt pots with an 8-12 quart capacity
MP11-MP12	Electrically heated melt pots with an 2-4 oz capacity
BC01	0.107 x 10 <sup>6</sup> Btu/hr Natural Gas Fired Bar Caster Burner

Source Code	Description
MI01 & MI02	Paste Mixer: two (2) units total
PL03-PL06	Natural Gas Fired Pasting Lines each with a heat input capacity of $4.8 \times 10^6$ Btu/hr: four (4) units total
PB01-PB16	Plate Breaking Table: sixteen (16) units total*
PB17 & PB18	Automated Plate Slitters*
CO11-CO28	Natural Gas Fired Curing Ovens each with a heat input capacity of $7.2 \times 10^6$ Btu/hr: 18 units total
PE11-PE18	Plate Envelopers: eight (8) units total
PS01-PS08	Plate Stacking: eight (8) units total
BS01-BS32	Burning Stations: 32 units total*
CS01-CS30	Casing Stations: 30 units total
IB01-IB12	Intercell Burning Stations: twelve (12) units total*
LH01	Laboratory Hood
B001-B006	Natural Gas Fired Boilers for Curing Ovens each with a heat input capacity of $3.78 \times 10^6$ Btu/hr : six (6) units total
OS01-OS03	Lead Oxide Silos – Three (3) silos each with a 100,000 lbs capacity
OM01 & OM02	Natural Gas Fired Oxide Manufacturing each with a heat input of $1.5 \times 10^6$ Btu/hr: two (2) units total
CVS1	75 Hp Central Vacuum System
CVS2	75 Hp Central Vacuum System
LH02	Fume Hood
WB01-WB12	Water Bath Tank Formation System: twelve (12) units total

\*Changes in Application No. 28609

## Updated Attachment B – List of Control Equipment

Control Device Source Code	Emission Unit Source Code Controlled	Description
BH01	BU11-BU16, GC11-GC16, MP01, BC01, MP03-MP06, MP11, PB01-PB08, PB17, MI01, PL03-PL06*	Cartridge Filter with HEPA Secondary
BH02	PE11-PE14, BS01-BS08, CS01-CS04, LH01-LH02*	Cartridge Filter with HEPA Secondary
BH03	PS01-PS02, CS05-CS08, IB01-IB04, PE15-PE17, BS09-BS20*	Cartridge Filter with HEPA Secondary
BH04	PE18, BU17-BU24, GC17-GC24, PB09-PB16, PB18, CS09-CS20*	Cartridge Filter with HEPA Secondary
BH05	MI01, PL03-PL04, PB01-PB08, PB17, BO01-BO03 (all future, currently on BH01)	Cartridge Filter with HEPA Secondary
BH06	PS03, MI02, PL03-PL04, BO04-BO06*	Cartridge Filter with HEPA Secondary
BH07	PS04, IB05-IB06, MP02, MP07-MP10, MP12, PS01	Cartridge Filter with HEPA Secondary
BH08	PS05, IB07-IB08, MP11, PB17, BO01-BO03	Cartridge Filter with HEPA Secondary
BH09	PS06-PS07, CS21-CS25, IB09-IB10, BS21-BS26, BU25-BU28*	Cartridge Filter with HEPA Secondary
BH10	PS08, CS26-CS30, IB11-IB12, BS27-BS32, GC25-GC28	Cartridge Filter with HEPA Secondary
BH11	OS01	Baghouse with HEPA Secondary
BH12	OS02-OS03	Baghouse with HEPA Secondary
BH13	OM01	Baghouse with HEPA Secondary
BH14	OM02	Baghouse with HEPA Secondary
BH15	CVS1	Baghouse with HEPA Secondary
BH16	CVS2	Baghouse with HEPA Secondary
WS01	WB01-WB12	Wet Scrubber

\*Changes in Application No. 28609

### **Permit Conditions**

Condition 6.1.b requires the facility to submit testing reports within 60 days after testing completion. However, Conditions 6.3 and 6.4 require testing reports to be submitted within 30 days after testing completion. The facility has requested that submittal dates for these conditions be changed to 60 days after testing for consistency. Conditions 6.3 and 6.4 have been revised as such.

### **Summary & Recommendations**

Concorde Battery Georgia Corporation/Interspace Battery Georgia Corporation is a lead acid battery manufacturing facility located in Austell. The facility will continue to be a synthetic minor source with respect to Title V permitting. A public advisory was issued on November 9, 2022 and expired on December 9, 2022. No comments were received. Based on the above considerations, I recommend issuing Permit Amendment No. 3691-067-0257-S-01-3 to the facility.